

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JENNIFER DOLD, personal representative
of the estate of Alexander Dold; and
KATHY DUNCAN, mother of Alexander
Dold,

Plaintiffs,

v.

SNOHOMISH COUNTY, a political
subdivision of the State of Washington;
BRYSON MCGEE; and CODY MCCOY,

Defendants.

No. 2:20-cv-00383-RAJ

DECLARATION OF RICHARD B.
JOLLEY

I, Richard B. Jolley, declare as follows:

1. I am one of the attorneys representing the Defendants in this lawsuit. I make this declaration based upon my own personal knowledge, upon facts which are admissible in evidence. I am competent to testify to the matters set forth in this declaration.

2. The following exhibits are cited or relied upon in Defendants McGee and McCoy's Motion for Summary Judgment:

A. Attached as **Exhibit A** is a true and correct copy of photo of Kathy Duncan's injuries.

B. Attached as **Exhibit B** is a true and correct copy of 911 Call transcript.

1 C. Attached as **Exhibit C** is a true and correct copy of 911 CAD.

2 D. Attached as **Exhibit D** is a true and correct copy of statement of
3 Deputy Jim Miner;

4 E. Attached as **Exhibit E** are true and correct copies of excerpts of
5 Cody McCoy deposition transcript;

6 F. Attached as **Exhibit F** are true and correct copies of excerpts of
7 Shaun Van Eaton deposition transcript;

8 G. Attached as **Exhibit G** are true and correct copies of excerpts of
9 Travis Block deposition transcript;

10 H. Attached as **Exhibit H** are true and correct copies of excerpts of
11 Bryson McGee deposition transcript;

12 I. Attached as **Exhibit I** is a true and correct copy of Snohomish
13 County Domestic Violence policies;

14 J. Attached as **Exhibit J** is a true and correct copy of Snohomish
15 County Medical Examiner report;

16 K. Attached as **Exhibit K** are true and correct copies of excerpts of
17 Stanley Adams, M.D. deposition transcript;

18 L. Attached as **Exhibit L** is a true and correct copies of excerpts of Kris
19 Sperry, M.D. deposition transcript;

20 M. Attached as **Exhibit M** is a true and correct copy of Kris Sperry,
21 M.D.'s report;

22 N. Attached as **Exhibit N** is a true and correct copy of Statement of
23 Officer Block;

24 O. Attached as **Exhibit O** are true and correct excerpts of Kathy
25 Duncan's deposition transcript

26 P. Attached as **Exhibit P** is a true and accurate copy of Kathy Duncan's
27 interview.

1 Q. Attached as **Exhibit Q** is a true and accurate copy of H
2

3 I declare under penalty of perjury under the laws of the State of Washington that the
4 foregoing is true and correct to the best of my knowledge.
5

6 DATED this 28th day of March, 2022, at Seattle, Washington.
7

8 /s/ Richard B. Jolley

Richard B. Jolley, WSBA #23473
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on March 28, 2022, I electronically filed the foregoing
3 with the Clerk of the Court using the CM/ECF system which will send notification of such
4 filing to the following:

5 **Attorneys for Plaintiffs**

6 James E. Lobsenz, WSBA #8787
7 CARNEY BADLEY SPELLMAN PS
8 701 Fifth Avenue, Suite 3600
9 Seattle, WA 98104
10 Phone: 206-622-8020
11 Email: lobsenz@carneylaw.com; groth@carneylaw.com
12 E-SERVICE AGREEMENT

13 **Attorneys for Defendant Snohomish County**

14 Ted Buck, WSBA #22029
15 Delaney DiGiovanni, WSBA #56851
16 Nick Gross, WSBA #48236
17 FREY BUCK P.S.
18 1200 5th Avenue, Suite 19
19 Seattle, WA 98101
20 Email: tbuck@freybuck.com; ngross@freybuck.com; ddigiovanni@freybuck.com;
21 dfalkowski@freybuck.com; ebariault@freybuck.com; sjohnson@freybuck.com

22 DATED: March 28, 2022

23 /s/ Richard B. Jolley

24 Richard B. Jolley, WSBA #23473
25 801 Second Avenue, Suite 1210
26 Seattle, WA 98104
27 Phone: (206) 623-8861
Fax: (206) 223-9423
Email: rjolley@kbmlawyers.com